

Based on the latest neutrality comments I am still trying to understand if this commission is ignorant, crooked, puppets or all of the above? You may need to hold a private meeting with AT&T or the other telcom/MSOs to have them explain how the commission should respond.

Year after year major telco and the cable industry turn over record profits on the backs of consumers. Your commission turns a blind eye to the current monopolistic landscape and refuses to even acknowledge it. The industry has for years marketed unlimited broadband and then places limits and/or barriers. They have routinely blocked, throttled, deep packet inspected, DNS redirected, and setup road blocks at every turn to block innovation or anything they deem a threat to their current outdated business model(s). They refuse to provide accurate broadband penetration data while at the same time suing or filing paperwork to hamper municipalities who have become fed up with the current status-Que and decide to build their own networks. When they are caught red handed the FCC opens an inquiry and generally nothing else is done.

The latest push by consumers is to use the Internet for video purposes. Anyone of the telcoms or MSOs could choose to innovate and be a fore-runner to the online video scene but because they do not currently have a monopoly (with your help sir they are working on it) inside that landscape and were late (due to their on greed), they instead have chosen to stifle and otherwise hamper other companies attempts to provide the consumer a better service at a cheaper price. Yes, this service is riding over the telcom/MSO pipes. Yes, some of these services require more bandwidth to the consumers home. But wait, I already pay for this bandwidth. The telco/MSO have already sold both sides of this transaction once. The government and consumers has already paid for the last mile many times over. They have sold the content distributor Internet access at X speed which is necessary to comply with the current consumer demand. They have also sold the consumer Internet access at X speed to comply with the consumers demand. With this model they are turning over record profits. However, the Internet video has the potential to take revenue from their video streams so they are using the FCC to help stifle this current shift.

If the telco/MSO offer X speed then make them provide an average of X speed WITH NO CAPS. I understand that the nature of the business requires over subscription. That model is not new and has been around for many years. If they would like to place caps on the amount of data that can be downloaded per month then the caps should be the speed sold, times the number of days in a month.

For instance one of the MSO?s currently offers ?High Speed Up To 7 Mbps?.

$(7 / 8) * 1024 = 896\text{kBps}$  (it would take 1.14 seconds to download a one meg file)

$1024 \text{ (1 meg file)} / 896\text{kBps} = 1.14 \text{ seconds}$

so for a 24 hour period I have the potential to download:

$\text{kBps} * \text{seconds} / 1024 = \text{meg} / 1024 = \text{gig}.$

$((896 * 86400) / 1024) / 1024 = 73.828125 \text{ megs or roughly } 73 \text{ gigs per day}.$

While this is a unrealistic scenario this also represents how much they currently oversubscribe and the amount of money they are gouging us for currently.

One U.S. company tried in 2009 to implement caps with an extremely low usage of 40GB for their ?standard? tier of ?Up To 7 Mbps?. While most users would not currently exceed this, it also shows how the current business model is not content with the current record profits and is worried about the possible ?cord-cutting? or Internet video taking revenue from other areas of their business. As more users begin to utilize the speed they have been sold, the telco/MSO will need to update the infrastructure to provide this. So lets break that math back down to see how long at the current speeds it would take to reach your cap and have excessively priced overages charged.

$40 \text{ gigs} * 1024 = 40960 \text{ megs} * 1024 = 41943040 \text{ kb} / 896\text{kBps} = 46811 \text{ seconds or } 13 \text{ hours at their advertised speed of } 7\text{Mbps}.$

So wait... If if the data is capped at 40 gigs then what is the average speed they expect you not to exceed?

$40\text{gigs} / 31\text{days} = 1.29 \text{ gigs per day} * 1024 = 1321 \text{ megs per day} / 24 \text{ hours} = 55 \text{ megs per hour} / 60 = .91 \text{ megs per minute} / 60 = 15.66\text{kBps}.$

So the reality is they are selling us a monthly average speed of 15.66kBps. Ok.... Wait.... If they are wishing to move to a consumption model then the billing needs to look like your current utility bill such as a water or electricity bill. This however is not what they want because most of their users are not heavy consumers and as such would have much much lower bills. They want the best of both worlds.

My requests:

Stop the private closed door meeting with telco/MSOs and allowing them to dictate policy. You should be representing the consumers.

Force telco/MSOs to provide accurate bandwidth coverage maps. This causes problems for both them and the administration due to the level of corruption and lies that continue to be the driving factors of our policy making. Shows the current monopoly that everyone but the commission apparently sees.

Force telco/MSOs to either run consumption based or speed based billing not the bastardized plan you just signaled you would sign off on.

Require the telco/MSOs to have free and open access to the Internet. No more blocking services, VOIP, deep packet inspecting, targeted advertising, DNS redirecting etc...). If I want targeted advertising, DNS redirecting, deep packet inspecting or throttled services let me go to the ISP's site and sign up for it. Revelation, you mean the general public doesn't really want these services after all? Public ignorance as to how data flows should not dictate the amount of manipulation the telco/MSOs are allowed to do.

Don't even get me started on how you guys are currently botching the wireless industry.